

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

DAMALI A. TAYLOR (CABN 262489)
Assistant United States Attorney
450 Golden Gate Ave., Box 36055
San Francisco, California 94102
Telephone: (415) 436-7200
Fax: (415) 436-7234
E-Mail: damali.taylor@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 3-11-00735 RS
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	DOCUMENTING EXCLUSION OF TIME
v.)	UNDER THE SPEEDY TRIAL ACT
)	
ROBERT NEWT,)	
)	
Defendant.)	
)	

The parties appeared before the Court in this matter on November 15, 2011 for an initial status conference. Assistant United States Attorney Damali Taylor appeared on behalf of the United States. Assistant Federal Public Defender Steven Kalar appeared on behalf of the defendant, ROBERT NEWT, who was present and in custody.

During the November 15, 2011 hearing, defense counsel informed the court that the parties had reached a tentative agreement with respect to defendant's plea. However, defense counsel needed time to review additional discovery that had been provided by the government and to discuss the plea agreement with his client. Defense counsel requested a future date of November 29, 2011 in order to provide the defense with sufficient time to do so. Defense counsel further requested that, in order to review the discovery and to conduct investigation

STIPULATION & ~~PROPOSED~~ ORDER
CR 3-11-0735 RS

1 necessary to effectively prepare defendant for resolution or trial, time be excluded under the
2 Speedy Trial Act between November 15, 2011 and November 29, 2011, the newly scheduled date
3 for change of plea or trial setting. Defense counsel represented that additional time is necessary
4 to review the evidence and discuss resolution with his client, and that doing so is in the best
5 interests of the defendant. The government had no objection to the November 29, 2011 date, and
6 the Court found good cause for the exclusion of time. The matter was continued to November
7 29, 2011 for the purpose of change of plea or trial setting.

8 The government also had no objection to excluding time and the parties stipulated to an
9 exclusion of time from November 15, 2011 to November 29, 2011. The parties agree that the
10 ends of justice served by granting such an exclusion of time outweigh the best interests of the
11 public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The Court made findings
12 consistent with the parties' agreement.

13
14 SO STIPULATED:

15
16 MELINDA HAAG
United States Attorney

17 DATED: November 28, 2011

18 /s/
DAMALI A. TAYLOR
Assistant United States Attorney

19
20 DATED: November 28, 2011

21 /s/
STEVEN KALAR
Counsel for the Defendant

1
2
3
4
5
6
7
8
9
1
1
1
1
1
1
1
1
1
2
2
2
2
2
2
2
2
2
2

IT IS SO ORDERED.


RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE